

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE VASO ACTIVE PHARMACEUTICALS)
SECURITIES LITIGATION)

1:04-cv-10708-RCL

MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Pursuant to Local Rule 83.5.3 and this Court's July 29, 2003 Case Management Order, the undersigned counsel, Theodore M. Hess-Mahan, hereby moves that this Court enter an Order granting leave to Marc I. Willner, Schiffrin & Barroway, LLP, Three Bala Plaza East, Suite 400, Bala Cynwyd, PA 19004, to appear on behalf of Plaintiffs and practice before this Court in the above-captioned consolidated action.

As grounds for this motion, the undersigned represents the following:

1. Mr. Willner is and has been a member in good standing of the bar of Commonwealth of Pennsylvania since November 1997, the United States Court of Appeals for the First Circuit since August 8, 2002, and the United States Court of Appeals for the Third Circuit since March 26, 2003.
2. There are no disciplinary proceedings pending against Mr. Willner as a member of the bar in any jurisdiction.
3. Mr. Willner has represented to the undersigned counsel that he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.
4. In further support of this motion, Mr. Willner has submitted herewith his Certificate of Good Standing as Required by Local Rule 83.5.3.

WHEREFORE, the undersigned counsel respectfully moves that Marc I. Willner be admitted to practice before this Court *pro hac vice*.

Dated: November 10, 2004

Respectfully submitted,

/s/Theodore M. Hess-Mahan

Theodore M. Hess-Mahan, BBO No. 557109

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